

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Michael Arquero,

Plaintiff,

vs.

Sheriff Tom Dart, Cook County  
Sheriff, And Officer John Doe, individually,

Defendants.

19 C 1528

Judge Manish S. Shah

Mag. Judge Maria Valdez

Jury Trial Demanded

**SHERIFF DART'S MOTION FOR AN EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendant Thomas Dart, Sheriff of Cook County (“Sheriff Dart” or the “Sheriff”), by his attorney KIMBERLY M. FOXX, State's Attorney of Cook County, through her Assistant State's Attorneys JOHN POWER and RYAN J. GILLESPIE, and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), moves this Honorable Court for a thirty (30) day extension of time to answer or otherwise plead in response to Plaintiff's Complaint, and states as follows:

1. Plaintiff initially filed his Complaint in this matter on March 4, 2019. (Dkt. # 1.)
2. Undersigned counsel was assigned to the case on April 11, 2019.
3. Undersigned counsel requests an extension of time for Sheriff Dart to answer or otherwise plead of thirty (30) days, up to and including June 3, 2019.
4. This is the Sheriff's first request for an extension of time.
5. This request for enlargement of time is made in good faith, and not to delay or prejudice Plaintiff.
6. Rather, it is to allow undersigned counsel to thoroughly investigate Plaintiff's claims and to prepare an answer or other responsive pleading.

7. Further, Sheriff Dart respectfully requests that this Honorable Court extend the time for the Parties to exchange mandatory initial disclosures as required by the MIDPP Standing Order in accordance with the June 3, 2019 date for the Sheriff's answer or responsive pleading.

8. Undersigned counsel attempted to contact Plaintiff's counsel on April 29, 2019 to inquire whether Plaintiff opposed the filing of this Motion, but could not make contact with them before needing to file this Motion to comply with the Court's 3-business-day notice rule.

WHEREFORE, Thomas Dart, Sheriff of Cook County, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), respectfully requests that this Honorable Court enter an Order:

- a. Granting an extension of time to June 3, 2019 to file an answer or otherwise plead in response to Plaintiff's Complaint;
- b. Extending the time by which the Parties are to exchange mandatory initial disclosures based on the June 3, 2019 date for Sheriff Dart's answer or responsive pleading; and
- c. Providing Sheriff Dart with any other relief that this Honorable Court deems necessary and just.

Respectfully Submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

By: /s/ Ryan J. Gillespie  
John Power  
Ryan J. Gillespie  
Assistant State's Attorneys  
500 Richard J. Daley Center  
Chicago, Illinois 60602  
(312) 603-5440  
john.power@cookcountyl.gov  
ryan.gillespie@cookcountyl.gov